

REMARKS

The specification and Abstract have been amended as requested.

By the foregoing amendments, claims 1 and 21, and claims 18 and 31 have been combined.

It is respectfully submitted that the rejection of the claims under 35 U.S.C. § 103 over Ludlow-Palafax in view of Holland is not tenable with respect to the claims as amended and should be withdrawn.

Ludlow-Palafax has been cited to show a bench-scale prototype reactor and the Office Action acknowledges that it does not teach using two reactors for effecting continuous recycling of a metal/organic laminate. Accordingly, the Holland reference is cited to eliminate this deficiency. However, regardless of whether or not Holland teaches using two reactors for affecting continuous recycling, neither reference teaches or suggests the configuration of the second rotary stirrer which is important for continuous recycling.

The specific configuration of the rotary stirrer in the second chamber enables the delaminated metal to rise to the surface of the bed and to migrate radially outwardly to the exit of the second chamber. As described at page 8, second paragraph, et seq., this is achieved by the use of a second stirrer having the specific shape previously set forth in claims 21 and 31, and now incorporated into the independent claims. It has a blade with an upper edge or surface that slopes downward from its midpoint to the extremities. More specifically, the second stirrer stirs in a horizontal

plane and has a configuration that fluidizes the mixture and enables the delaminated metal to be easily or continuously recovered from the exit.

In contrast to the present invention, the Ludlow-Palafox stirrer has a rectangular shape. While the text in the left-hand column of page 47-50 states that the blades have a 45° pitch, there is no disclosure of a blade where the upper edge or surface slopes down from the midpoint towards the extremities of the blade. There is nothing in this reference which would lead the person skilled in the art to use the stirrer now specified in the claims.

Holland teaches a housing 1 with a conveyor belt 2 which moves in the direction of arrow 4 to transport organic material through a pre-heating zone and a pyrolysis zone. It does not disclose a blade where the upper edge or surface slopes down from the midpoint to the extremities of the blade and there is nothing in this reference which would lead a person of ordinary skill toward the use of such a stirrer. Instead, Holland teaches that the conveyor belt moving through the housing enables continuous recycling of waste organic material.

Since neither of the references teach nor suggest the second chamber blade of the present invention, no possible combination would lead the skilled person to the claimed invention.

The appropriateness of the combination of the two references is also questioned. There are fundamental differences between the processes taught and they would have led the skilled person away from combining the teachings. These differences include, *inter alia*, the nature of the apparatus used to facilitate pyrolysis, i.e.,

agitation blades within a reactor in Ludlow-Palafox as oppose to a conveyor belt within a housing in Holland and Holland's clear emphasis on the use of particularly high microwave input energy compared to other microwave reactors.

In light of the foregoing considerations, it is respectfully submitted that this application is now in condition to be allowed. The early issuance of a notice of allowance is respectfully solicited.

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Respectfully submitted,

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